

MAURICE WOOD
8250 West Charleston Blvd., Suite 100
Las Vegas, Nevada 89117
Tel: (702) 463-7616 Fax: (702) 463-6224

AARON R. MAURICE, ESQ.
Nevada Bar No. 6412
BRITTANY WOOD, ESQ.
Nevada Bar No. 7562
ELIZABETH E. ARONSON, ESQ.
Nevada Bar No. 14472
MAURICE WOOD
8250 West Charleston Blvd., Suite 100
Las Vegas, Nevada 89117
Telephone: (702) 463-7616
Facsimile: (702) 463-6224
E-Mail: amaurice@mauricewood.com
bwood@mauricewood.com
earonson@mauricewood.com

Attorneys for Defendants,
STEWART TITLE GUARANTY COMPANY and
STEWART INFORMATION SERVICES
CORPORATION

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

* * *

WILMINGTON TRUST, NATIONAL
ASSOCIATION, NOT IN ITS INDIVIDUAL
CAPACITY BUT AS TRUSTEE OF ARLP
SECURITIZATION TRUST, SERIES 2014-2,

Plaintiff,

vs.

STEWART INFORMATION SERVICES,
CORP.; STEWART TITLE GUARANTY
COMPANY; DOE INDIVIDUALS I through X;
and ROE CORPORATIONS XI through XX,
inclusive,

Defendants.

CASE NO. 2:21-cv-01880-APG-VCF

**STIPULATION AND ORDER TO
EXTEND TIME PERIOD TO FILE
RESPONSE TO MOTION TO
REMAND [ECF No. 10]**

[First Request]

Defendants Stewart Title Guaranty Company ("STGC") and Stewart Information Services Corporation ("SISC") (collectively, "Defendants"), by and through their attorneys of record, the law firm of MAURICE WOOD, and Plaintiff Wilmington Trust, National Association, not in its Individual Capacity but as Trustee of ARLP Securitization Trust, Series 2014-2 ("Plaintiff"), by and through its counsel of record, WRIGHT FINLAY & ZAK, hereby stipulate and agree as follows:

MAURICE WOOD
8250 West Charleston Blvd., Suite 100
Las Vegas, Nevada 89117
Tel: (702) 463-7616 Fax: (702) 463-6224

1. On September 14, 2021, Plaintiff filed its Complaint in the Eighth Judicial District Court, Case No. A-21-831193-C. See ECF No. 1-1.

2. On October 12, 2021, Defendants filed a Petition for Removal with this Court, based upon diversity jurisdiction. See ECF No. 1.

3. On October 12, 2021, SISC filed a Motion to Dismiss for Lack of Personal Jurisdiction pursuant to Fed. R. Civ. P. 12(b)(2). See ECF No. 5.

4. The Parties previously discussed a stipulation to stay this case in its entirety, but on November 1, 2021, the Parties agreed to a partial stay pending SISC's Motion to Dismiss and Plaintiff's forthcoming Motion for Remand. Because briefing on Plaintiff's Motion to Remand will proceed, Defendants are requesting additional time to file their response to Plaintiff's Motion.

5. On November 2, 2021, Plaintiff filed its Motion to Remand. See ECF No. 10.

6. On November 3, 2021, Plaintiff filed a Stipulation and Order, requesting that Plaintiff's deadline to respond to SISC's Motion to Dismiss be extended to November 10, 2021, which SISC did not oppose. See ECF No. 12.

7. Defendants' deadline to respond to Plaintiff's Motion to Remand is currently November 16, 2021. See ECF No. 10.

8. Because SISC's Motion to Dismiss was filed first, SISC believes that SISC's Motion should be fully briefed prior to Plaintiff's Motion to Remand.

9. Accordingly, Defendants request a brief extension of two weeks from the current deadline, until November 30, 2021, to file its Response to Plaintiff's Motion to Remand.

10. Counsel for Plaintiff does not oppose the requested extension.

///

///

///

///

///

///

///

11. This is the first request for an extension which is brought in good faith and not for purposes of delay.

DATED this 8th day of November, 2021.

DATED this 8th day of November, 2021.

MAURICE WOOD

WRIGHT FINLAY & ZAK, LLP

By: /s/ Elizabeth E. Aronson

By: /s/ Lindsay D. Dragon

AARON R. MAURICE, ESQ.

DARREN T. BRENNER, ESQ.

Nevada Bar No. 006412

Nevada Bar No. 8386

BRITTANY WOOD, ESQ.

LINDSAY D. DRAGON, ESQ.

Nevada Bar No. 007562

Nevada Bar No. 13474

ELIZABETH E. ARONSON, ESQ.

CHRISTINA V. MILLER, ESQ.

Nevada Bar No. 014472

Nevada Bar No. 12448

8250 West Charleston Blvd., Suite 100

7785 W. Sahara Ave., Suite 200

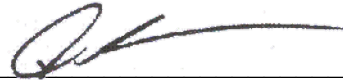
Las Vegas, Nevada 89117

LAS VEGAS, NV 89117

Attorneys for Defendants

Attorneys for Plaintiff

IT IS SO ORDERED.



UNITED STATES DISTRICT COURT JUDGE

DATED: November 10, 2021

MAURICE WOOD
8250 West Charleston Blvd., Suite 100
Las Vegas, Nevada 89117
Tel: (702) 463-7616 Fax: (702) 463-6224